



Solutia Inc.
W.G. Krummrich Plant
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Tel 618-271-5835

November 6, 2002
(Via certified or express mail)

Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

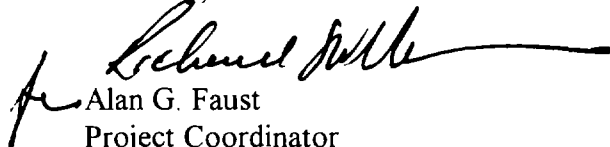
Thomas Martin
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
18 - November 2002 Monthly Report**

Dear Mr. Turner and Mr. Martin,

Enclosed is the November 2002 **Monthly Report** for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting.

Sincerely,


Alan G. Faust
Project Coordinator
Solutia Inc.

cc:
Michael Ribordy - USEPA Region 5
Sauget File - Solutia
S. Bron - IEPA
Mayor D. Reed - Cahokia
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)
Linda Tape - Husch & Eppenberger
Mike Henry - IDNR
Kevin de la Bruere - USFW
Mayor P. Sauget - Sauget, IL

EPA Region 5 Records Ctr.



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Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Monthly Report

Date of Report: November 6, 2002
Period Covered: October 1, 2002 - October 31, 2002
Next Report Period: November 1, 2002 - November 30, 2002

Background

A Unilateral Administrative Order (“UAO”) was issued to Solutia by the U. S. EPA on May 31, 2000, requiring construction of **an on-site** containment cell, removal of affected creek bed sediments and soils and **flood plain** soils from specific sections of Dead Creek, and placement of the affected sediments **and** soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan (“TCRAWP”) was initially submitted to the Agencies on June 30, 2000 for review **and** approval. Agreements sufficient to proceed with issuance of a request for bids for the containment cell construction were reached in December 2000. Bids were received in **late January** and evaluated in February 2001.

Fieldwork began on the sediment **de-watering** phase of the project in November 2000. Installation of the required facilities (**pipng, pumps**, basins, etc.) to de-water the sediments while the containment cell was being constructed was completed and started up in February 2001. Operation of these facilities will continue until all sediments are placed into the containment cell.

Subject to the inclusion of **all comments and** agreed upon revisions; approval of the containment cell design by U. S. EPA **was received** on March 5, 2001. A contract for construction of the containment cell **was awarded** on March 8, 2001 to LMS Environmental Contracting, Inc. (“LMS”). Placement of fill for the Containment Cell berms began on April 23, 2001. A **March 30, 2001** revised draft containment cell design was approved by the Agencies in a **May 10, 2001** letter. Construction was completed on the Containment Cell on September 13, 2001. A draft Containment Cell Certification Report was submitted for the Agencies’ review and approval upon construction completion. The Containment Cell **was approved** on September 24, 2001 by USEPA and IEPA for receipt of sediment. Placement of sediments into the cell began on September 26, 2001.

An Amendment to the UAO was **received on** October 29, 2001. The Amendment modified the project scope of the UAO – **adding** Creek Sector F sediments removal and placement into the Containment Cell. **On August 20, 2001**, Solutia requested a change in

the Post Removal Confirmation Sampling and analytical protocols. In a November 30, 2001 communication, the Agency responded with revised sampling and analytical protocols.

Agency Actions / Communications

- Revision 01 Draft Groundwater Monitoring Plan - submitted to the Agencies on August 3, 2001 – remained under review.
- The Operations and Maintenance Report - submitted for Agencies' review and approval on August 28, 2001- **remained** under review. Portions of the Plan applicable to the placement of **sediments** have already been approved.
- Responses to comments received from USEPA on the Mitigation Plan for Dead Creek – submitted to the Agencies on August 1, 2001 – remained under review.

Work Performed during the reporting period

- Performed weekly inspection of the site.
- Maintained operation of the 50-gpm stormwater treatment system.
- Inspected and maintained the 6oz. Geotextile/6 mil scrim reinforced poly cover over the containment cell.
- Maintained stormwater and leachate collection controls around the containment cell.
- Monitored support area facilities.

Data Submittal

No data are submitted with this report.

Work scheduled for next reporting period

- Conduct routine inspection of the containment cell.
- Continue operation of the 50-gpm stormwater treatment system.
- Perform necessary operation and maintenance on the containment cell and temporary treatment system.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %

Problems and Solutions

In discussion with officials from the **Village of Cahokia**, standing water in separate segments of Dead Creek emerged as a **source of concern**, given the current public health warnings about the West Nile Virus. **The water** is stagnant because the creek bottom is significantly lower than culvert inverts.

Because of this concern, Solutia agreed to **install** temporary pumps to pump the water downstream. This work was **completed during** the September 1, 2002 – September 30, 2002 reporting period. A permanent **pumping** system was installed this reporting period. The system consists of six pumps **permanently** mounted in the creek. The pumps are fitted with level control switches and will **pump water** downstream through the existing culverts when the water level is below the culvert inverts.

Submittal Schedule Status

See attached UAO schedule

Issues under review

None

Comments

None

May 31 Sauget Area I UAO Sediment Removal Action

SCHEDULE

Deliverable	Description	Due Date
Issuance Date	Date UAO signed by Muno	31-May-00
Effective Date	10 business day after issuance	14-Jun-00
Notice of Intent to Comply	3 business days after effective date	19-Jun-00
Designation of Contractor and Project Coordinator	5 business days after effective date	21-Jun-00
Access	14 calendar days after effective date	28-Jun-00
Time Critical Removal Action Work Plan Submittal	15 business days after effective date	7-Jul-00
EPA Approval of TCRA W/P		May 10, 2001
Monthly Reports	Begin 30 calendar days after approval of TCRA W/P until completion	June 10, 2001
Final Report	60 Calendar days after completion of sediments and soils removal	
Mitigation Plan	60 Calendar days after completion of sediments and soils removal	May 22, 2002